Request:

Please provide a complete copy of any analysis performed by SBC Ameritech or on SBC Ameritech's behalf within the last 2 years that analyses SBC Ameritech's ability to perform loop qualification for DSL services on a fully or partially mechanized manner.

Response:

See attached documentation.

Marian Dyer
Vice President-Federal Regulatory

1401 I Street N.W.
Suite 1100
Washington, D.C.
Phone 202 326-8913
Fax 202 408-4803

SBC

STAMP & RETURN

April 3, 2000

Mr. Lawrence E. Strickling:
Chief
Common Carrier Bureau
Federal Communications Commission
445 12th St., SW
Washington, DC
Dear Mr. Strickling:

In accordance with paragraph 15(c) of the SBC/Ameritech Merger Conditions ("merger condition 15(c)") and pursuant to your February 24 letter, Phase 2 (the extended collaborative sessions) of the Advanced Services Plan of Record has been completed. Paragraph 15(c) directs SBC to "develop and deploy...in advance of industry standards,...both enhancements to the existing Datagate or EDI interfaces for preordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components...." The participants reached agreement on a significant number of enhancements to the existing Datagate or EDI interfaces as outlined in the revised Plan of Record accompanying this transmittal. However, the parties continue to disagree on a number of issues, several of which are outside the scope of merger condition 15(c).

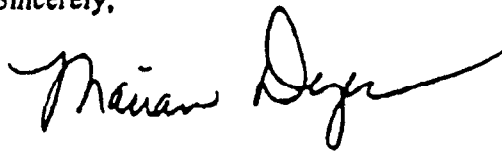Accordingly, in compliance with paragraph 15(c), SBC submits the following:

- A plan for development and deployment of enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components incorporating items on which written agreement was reached during the workshop sessions.Disputed language is highlighted in yellow. SBC will file a copy of the signed written agreement under separate cover.

- A list of unresolved issues, many of which, in SBC's view, are outside the scope of merger condition 15(c). SBC understands that the CLEC community intends to file its own list of issues in dispute. Once it has reviewed the CLECs' filing, SBC will comment on the CLECs' disputed issues including the appropriateness of inclusion of such issues in this merger condition, and/or whether such issues are more appropriately addressed in other forums.

The POR demonstrates that SBC has and continues to add significant functionality to the existing Datagate and EDI interfaces. The implementation dates for many system

releases have been greatly advanced at the urging of the CLEC community. Additionally, the revised Plan of Record reflects items added by SBC, which were not directly related to merger condition 15(c), but which were important to the CLEC community. For example, SBC agreed to deploy an additional GUI interface in the Ameritech states although such a commitment would more appropriately be included in the Uniform and Enhanced OSS Plan of Record. SBC also agreed to update OSS systems beyond the scope of paragraph 15(c), such as LEX and Verigate, and to synchronize those systems with Datagate and EDI changes. In short, this POR provides the CLEC community with a robust array of preordering and ordering functions for xDSL and other Advanced Services. And, as previously volunteered by SBC, the Company has already begun to implement the original set of enhancements from the first collaborative session. The first release occurred on March 18, 2000.

SBC respectfully submits that implementation of the Plan as submitted herein fully complies with merger condition 15(c), and in some areas, goes well beyond those requirements. However, we await your instruction as to the next course of action.

Sincerely,

Enclosures
CC: Ms. Mattey
       Mr. Dale

Enhanced OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services – March 31, 2000

I. OVERVIEW

A. Introduction

This Plan of Record has been developed in response to the Federal Communications Commission (FCC) requirements pertaining to the pre-ordering and ordering of Digital Subscriber Line (DSL) and other Advanced Services as set forth in the SBC Communications (SBC)/Ameritech Merger Conditions approved in the Memorandum of Understanding and Order, released on October 8, 1999 (SBC/Ameritech Merger Conditions). This document is designed to provide a comprehensive analysis and plan focused on the development of enhancements to DataGate and Electronic Data Interchange (EDI) for Pre-Ordering and EDI for Ordering.

The development of this Plan of Record began with the initial analysis performed for the Operations Support Systems (OSS) Process Improvement Plan previously filed with the FCC. SBC has followed the approach described in the OSS Process Improvement Plan, which included hosting two separate Competitive Local Exchange Carrier (CLEC) DSL Business Needs Workshops in November 1999. Several CLEC recommendations have been incorporated into this Plan of Record.

As required by the SBC/Ameritech Merger Conditions, SBC/Ameritech and interested CLECs met in multiple collaborative sessions following the initial filing of this Plan of Record with the FCC on December 7, 1999. This Plan of Record has been amended to reflect the results of those collaborative sessions.

Consistent with the SBC/Ameritech Merger Conditions, all references to CLEC(s) include SBC's data affiliates and retail organizations operating, or to be operating, under joint marketing agreements on behalf of the data affiliates, when ordering the local competitive products included in the scope of this plan.

B. Scope

This Plan of Record has been developed in accordance with the SBC/Ameritech Merger Conditions to provide pre-ordering and ordering of xDSL and other Advanced Services, as specified in paragraph 15c. An analysis of the Present Method of Operation (PMO) was completed for each of the four regions of SBC. A Future Method of Operation (FMO) was developed to enhance pre-ordering and ordering of xDSL.

As the implementation dates for OSS interface modifications contemplated by SBC in response to the FCC Third Report and Order and Fourth Notice of Proposed Rule Making in CC Docket No. 96-98 (UNE Remand Order) and the FCC Fourth Report and Order in CC Docket No. 96-98 (Line Sharing Order) are within the time period covered by this Plan of Record, those modifications are also described in this Plan.

In response to the SBC/Ameritech Merger Conditions, this process explicitly addresses the pre-ordering and ordering processes and enhancements pertaining to EDI and DataGate. However,

consistent with the input provided through the CLEC DSL Workshops, other Advanced Services (i.e., Frame Relay and Cell Relay services) will continue to be ordered through the industry-standard Access Service Request (ASR) mechanized ordering process currently deployed throughout the SBC thirteen states.

During the development of this plan, the data capabilities (i.e., connectivity) and hardware capabilities were determined to require no changes since these capabilities are not product specific. Since the SBC/Ameritech Merger Condition specifically calls for enhancements to the existing DataGate and EDI interfaces, existing data and hardware capabilities will continue to apply.

C. Process Methodology

As mentioned above, the process utilized to develop this Plan of Record was based on the SBC/Ameritech Pre-Merger OSS Process Improvement Plan. In responding to the Process Improvement Plan, first a detailed review of each regional PMO was undertaken including current business rules, processes and capabilities. Second, an analysis of the existing DataGate and EDI interface capabilities was completed as well as an inventory of relevant data elements. The process further identified the data sources for these elements and, where data sources existed, whether the data resided in a database or in manual records. Next, CLEC business needs were solicited through xDSL CLEC Workshops hosted by SBC. Through streamlining processes and integrating data gathered through the xDSL CLEC Workshops, a common FMO was established. The information obtained through these processes is provided below in the PMO and FMO sections of this document. Also, a glossary of terms used in the document is included as Attachment A.

Currently, each SBC service area has its own Change Management Process (CMP). These processes were developed collaboratively with the CLECs (except in Ameritech) well before the SBC/Ameritech merger, and have each been in place since at least June 1999. CMP provides a means by which each regional company and the CLECs can work cooperatively to introduce changes to the OSS interfaces. These processes include specific intervals, such as when release specifications will be delivered to the CLECs for review and input. However, due to the short timeframes associated with this Plan of Record the exception process has been and will continue to be utilized to implement the enhancements specified in the Plan of Record. The release dates for all enhancements associated with this Plan of Record have been included in the timeline found in the FMO section of this document.

A 13-state CMP is currently being addressed in a separate CLEC collaborative effort that began in November 1999 following the SBC/Ameritech merger close. The 13-state CMP is expected to be approved by SBC and the CLECs in June 2000. Once implemented, as described in the CMP transition plan, SBC will replace the various CMP processes currently in use with this new CMP. SBC is committed to using the CMP to deliver the changes identified in this POR.

A. Overview

Digital Subscriber Line technology allows broadband services such as video, voice. and data to be transmitted over standard copper cable. DSL services have specific technology requirements that make some form of qualifying potential loops mandatory for successful deployment. Qualification and ordering processes indicate whether a loop is capable of supporting xDSL technology and offer CLECs an opportunity to either condition the loop or make alternate decisions about their technology deployment choice.

SBC's regions offer a wide variety of pre-ordering functionality available through various proprietary and industry standard interfaces and manual processes. All regions utilize some of the same data elements, though there are differences from region to region. Pre-ordering functions applicable to xDSL loops are listed below:

- Address Validation/Verification – allows a client to validate that an address is within the SBC serving area and provides location specific information

- NC – allows a client to validate a Network Channel (NC) code

- NCI – allows a client to retrieve valid Network Channel Interface (NCI) and Secondary Network Channel Interface (SECNCI) codes to be used in the ordering process

- Pre-Qualification – determines generalized information about loop length and indicates availability of xDSL service at a specific address

- Loop Qualification – determines specific, detailed loop make-up information for a loop to a specific address and provides information necessary to determine the suitability of that loop for xDSL services

The pre-ordering functions listed above have similarities with some minor differences by region. Only the last two functions are unique to xDSL, therefore the PMOs that follow will focus on these functions. The ordering process for xDSL-capable loops is similar to the current ordering process for UNE loops; therefore the document will focus on the unique ordering steps of an xDSL loop.

B. PMO for Southwestern Bell Region (SWBT)

Pre-Qualification
Pre-qualification is a screening function to aid in determining the probability that a loop will be able to support the service the CLECs intend to offer. Pre-qualification is available to CLECs via DataGate or Verigate. The pre-qualification step is optional and there is no charge for this service.

Pre-qualification provides the 26 gauge equivalent designed loop length and a "Green", "Yellow" or "Red" status. This status is defined as follows:

- "Green" indicates the longest designed loop for the Distribution Area (DA) serving the specified address is less than or equal to 12,000 feet.

- "Yellow" indicates the designed loop for the DA serving the specified address is between 12,000 and 17,500 feet.

- "Red" indicates the designed loop for the DA serving the specified address is longer than 17,500 feet and/or that the DA is served exclusively by Digital Loop Carrier (DLC). It may also indicate that the specified address is in a wire center that neither SWBT nor any CLEC has specified for xDSL deployment.

Loop Qualification

Loop qualification is a manual process. The loop qualification request is faxed to the Local Service Center (LSC); the LSC service representative completes a loop qualification request form and forwards it to Outside Plant (OSP) Engineering. OSP Engineering performs the loop qualification and returns it to the LSC who forwards the results to the CLEC. This process can be performed prior to the submission of an order; if not, it is performed upon receipt of the Local Service Request (LSR). There is a charge for loop qualification regardless of when in the process this step is performed. The loop qualification process takes 3-5 business days from the time a correct loop qualification request is received by the LSC (from CLEC) to the time loop qualification is completed by OSP Engineering and returned to the CLEC. The loop qualification information returned to the CLEC includes:

- 26 gauge equivalent loop length

- Actual length of the loop by gauge

- Quantity of bridged taps, load coils and repeaters present on the loop

- Length of the feeder cable (F1) and the distribution cable (F2) respectively

- Existence of fiber in the loop

- Any disturbers currently present in the same and adjacent binder group

- An indication as to whether the loop currently qualifies for the CLEC specified Power Spectral Density (PSD), based on the industry standards or draft standards, whichever are currently published

- Tracking number (which must be referenced if an order is placed)

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order. The loop make-up information returned to the CLEC is considered valid for 30 calendar days.

Ordering

Ordering is initiated by submitting an LSR with the necessary information for an xDSL-capable loop. This includes a tracking number when loop qualification has been performed in advance. The CLEC can submit the LSR via fax, the Local Service Request Exchange (LEX) system or

EDI.

When there is no tracking number on the request, the LSC will suspend processing until the loop qualification step is performed. The LSC will return a copy of the results to the CLEC.

When the loop meets the specifications and/or the conditions on the LSR, the service order is issued and the Firm Order Confirmation (FOC) is returned to the CLEC. Conversely, if the loop did not meet the specifications and/or conditions specified by the CLEC, the LSR will be rejected. The CLEC then has the option of resubmitting the LSR with revised specifications and/or conditions.

C. PMO for Pacific Bell / Nevada Bell Region (PB/NB)

Pre-Qualification
Pre-qualification is a screening function to aid in determining the probability that a loop will be able to support the service the CLECs intend to offer. Pre-qualification is available to CLECs via DataGate, Verigate or manually. The pre-qualification step is optional and there is no charge for this service.

Pre-qualification provides RTZ indicators of 12, 17, 18, or blank, which equate to the following information:

- "RTZ 12" indicates the designed loop for the DA serving a specified address is between 0 and 12,000 feet. A "12" status indicates the loop will qualify for most types of xDSL.

- "RTZ 17" indicates the designed loop for the DA serving a specified address is between 12,001 and 17,500 feet.

- "RTZ 18" indicates the designed loop for the DA serving a specified address is over 17,500 feet from the central office.

- "Blank" indicates that the specific address is in a wire center that neither PB / NB nor any CLEC has specified for xDSL deployment yet.

For CLECs who do not utilize Verigate/DataGate for pre-ordering activities, the PB / NB region will provide the information via phone, fax or email at the CLEC's request.

Based on the type of xDSL loop specified in interconnection agreements, a pre-qualification result of RTZ 12 requires no further qualification of the loop. When the RTZ result is 17, 18 or blank, a full loop qualification should be performed as described below.

Loop Qualification
Loop qualification allows the CLEC to obtain detailed loop qualification/make-up information through manual requests via e-mail or fax. The charge for loop qualification service is based on individual contracts.

The loop qualification process in the PB / NB region is partially mechanized. After the CLEC submits the loop qualification request, the LSC utilizes an internal mechanized tool to obtain primary loop make-up information. If the mechanized tool fails to provide all the necessary elements, a manual engineering process is invoked to determine the full loop make-up. Loop qualification information, whether obtained manually or mechanically, provides the following:

- 26-gauge equivalent designed loop length
- Length of the loop by gauge
- Length of bridged tap, presence of load coils and repeaters

- F1 and F2 information
- Existence of fiber
- Any associated disturber technologies
- Provisioning interval
- Transaction code (or Tracking number)

PB / NB's response to the CLEC with qualification information can range from 5 minutes to 72 hours. Because high demand for xDSL service is constantly impacting the network profile, the loop make-up information returned to the CLEC is valid for 30 calendar days.

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order.

Ordering
Pacific Bell and Nevada Bell currently offer two ordering options for a CLEC. A CLEC can order an xDSL-capable loop via an LSR or an Interconnection Service Request (ISR). LSRs can be submitted electronically (LEX or EDI) or manually (fax, mail). ISRs can be only be submitted electronically via CESAR.

Upon receipt of a valid LSR/ISR, with a loop qualification transaction code for an address that was qualified within 30 calendar days of submission, the request will not need to be qualified again. The request will be processed, a service order generated and the FOC returned to the CLEC.

Any xDSL loop request received without the presence of a transaction code, or with a transaction code more than 30 days old will require loop qualification. The request will be loop qualified using whatever combination of RTZ indicators, mechanical and manual qualification necessary to determine if the address qualifies for the requested type of DSL loop.

If the address does not qualify for the specific type of DSL requested and is longer than 18,000 feet, PB / NB will contact the CLEC with a recommendation for an IDSL loop. It is then the CLEC's responsibility to decide if an order should/should not be placed for the original or recommended DSL technology.

Once PB / NB processes the service order, a FOC will be sent back to the CLEC. At this time, loop make-up information will be provided back to the CLEC. The standard interval for unconditioned loops is 7 business days, 10 business days for conditioned loops, and 15 business days for loops requiring repeaters. Design Layout Reports (DLRs) are currently provided only for loop types that require repeaters.

D. PMO for Ameritech Region

Pre-Qualification
Ameritech currently does not provide pre-qualification of xDSL loops.

Loop Qualification
Loop qualification allows the CLEC to obtain detailed loop qualification/make-up information through manual requests via e-mail. The charge for loop qualification service is based on time spent on each request.

Loop qualification information provides the following:

- Length by gauge, by segment
- Location of cable plant (A=aerial, B=buried, U=underground)
- Capacitance – existence of interferers such as range extenders, MFTs, etc
- Location and approximate length of bridged taps
- Load Coils – including type, and location
- Number of points of loading
- Presence of DLC (Yes/No)
- Copper or Fiber fed DLC
- Loop make-up is described from the customer premises back to serving central office

Ameritech's response to the CLEC with qualification information can range from sixty minutes to five business days.

The CLEC can calculate 26-gauge equivalent loop length using a formula. which Ameritech provides. After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order.

Ordering
Ameritech currently offers two ordering options to a CLEC. A CLEC can order an xDSL-capable loop via a Local Service Request (LSR) or an Access Service Request (ASR). Both requests must be submitted electronically either via EDI or BDS-Telis (EXACT).

Once a valid order is received, a due date will be assigned to the order. If no dispatch is required. the standard interval per the CLEC's interconnection agreement will be assigned. If a dispatch is required, the loop order will be assigned an available due date per the network administration Force and Load system. All retail local exchange service orders as well as all unbundled loop orders requiring dispatch are assigned available due dates from this system on a first-come, first-served basis. The FOC with an expected due date is returned to the CLEC within an established interval.

If a loop exists that meets the technical specifications for the requested loop type (NC/NCI code combination), Ameritech will provision the loop. If conditioning is required to make the loop meet the required technical specifications, the order will be sent to engineering for an estimate of the cost and timeframe required to make the loop meet the technical specifications for the type of loop ordered. Once developed, this information is then provided to the CLEC via fax on a "Loop Make-up (LMU) Response Notice". At this point in time, the order is "suspended" awaiting approval from the CLEC regarding payment of the associated costs and acceptance of the due date. If the CLEC has not acted on the notice within 5 days, the order is cancelled. If the CLEC indicates an acceptance of the costs and due date, provisioning will commence.

E. PMO for Southern New England Telephone Region (SNET)

Pre-Qualification
SNET currently does not provide pre-qualification of xDSL-capable loops.

Loop Qualification
Loop qualification is a manual process. The loop qualification request is faxed to the Local Exchange Carrier Center (LECC); the LECC service representative completes a loop qualification request form and forwards it to Outside Plant (OSP) Engineering. OSP Engineering performs the loop qualification and returns it to the LECC who forwards the results to the CLEC. If this process is not performed prior to the submission of an LSR; it will be performed upon receipt of the LSR. There is a charge for loop qualification regardless of when in the process this step is performed. The loop qualification process takes 3-5 business days from the time a correct loop qualification request is received by the LECC to the time loop qualification is completed by OSP Engineering and returned to the CLEC. The loop qualification information returned to the CLEC includes:

- 26 gauge equivalent loop length

- Actual length of the loop by gauge

- Quantity of bridged taps, load coils and repeaters present on the loop

- Length of the feeder cable (F1) and the distribution cable (F2) respectively

- Existence of fiber in the loop

- Any disturbers currently present in the same and adjacent binder group.

- An indication as to whether the loop currently qualifies for the CLEC specified Power Spectral Density (PSD), based on the industry standards or draft standards, whichever are currently published

- Tracking number (which must be referenced if an order is placed)

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order. The loop make-up information returned to the CLEC is considered valid for 30 calendar days.

Ordering
Ordering is initiated by submitting an LSR with the necessary information for an xDSL-capable loop. This includes a tracking number when loop qualification has been performed in advance. The CLEC can submit the LSR via fax or paper mail.

When there is no tracking number on the request, the LECC will suspend processing until the loop qualification step is performed. The LECC will return a copy of the results to the CLEC.

When the loop meets the specifications and/or the conditions on the LSR. the service order is issued and the FOC is returned to the CLEC. Conversely, if the loop did not meet the specifications and/or conditions specified by the CLEC. the LSR will be rejected. The CLEC then has the option of resubmitting the LSR with revised specifications and/or conditions.

F. PMO Comparison

The following charts show a comparison of the pre-qualification, loop qualification and ordering processes currently in the four regions.

PMO Pre-Qualification

Item/Function	Ameritech	SWBT	SNET	PB/NB
Pre-qualification optional?	N/A	Yes	N/A	Yes
Phone, Fax, Email	No	No	No	Yes
DataGate / Verigate	N/A	Yes	N/A	Yes
Data Returned	N/A	Green, Yellow, Red; 26-gauge equivalent loop length	N/A	RTZ = 12, 17, 18. Blank
Charge for pre-qualification	N/A	No	N/A	No
If result is 17, 18, or blank, perform loop qualification	N/A	No	N/A	Yes
If result is 12, can issue order without loop qualification per specifications of CLEC contract	N/A	No	N/A	Yes

PMO Loop Qualification

Item/Function	Ameritech	SWBT	SNET	PB/NB
E-mail	Yes	No	No	Yes
Fax	No	Yes	Yes	Yes
Return qualification and detailed loop make-up	Yes	Yes	Yes	Yes
Return tracking number	No	Yes	Yes	No
Return transaction code	No	No	No	Yes
Qualification good for 30 days	No	Yes	Yes	Yes
Charge for qualification lookup	NRC for time spent per loop request	Charge per CLEC contract	Charge per CLEC contract	Charge per CLEC contract
Interval for returning qualification response	1 hour to 5 business days	3 to 5 business days	3 to 5 business days	5 minutes to 72 hours

PMO Ordering

Item/Function	Ameritech	SWBT	SNET	PB/NB
Manual LSR	No	Yes	Yes	Yes
BDS-Telis (EXACT)	Yes	N/A	N/A	N/A
EDI	Yes	Yes	No	Yes
LEX	N/A	Yes	N/A	Yes
CESAR - (ISR)	N/A	N/A	N/A	Yes
Look for Tracking /Transaction number on LSR	No	Yes	Yes	Yes
LSC initiates loop qualification when tracking/transaction number not on LSR	No	Yes	Yes	Yes
Reject LSR if loop doesn't qualify	No	Yes	Yes	No

Item/Function	Ameritech	SWBT	SNET	PB/NB
If address doesn't qualify, recommend IDSL	No	No	No	Yes
FOC sent	Yes	Yes	Yes	Yes
Suspend order if conditioning required. Cancel in 5 days if no CLEC response	Yes	No	No	No